

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREGORY COLBURN, et al.,

Defendants.

Case No. 1:19-cr-10080-NMG

***Leave to File Partially Under Seal Granted
on July 28, 2021 (ECF No. 1972)***

DEFENDANTS' PROPOSED JURY INSTRUCTIONS

Pursuant to Fed. R. Crim. P. 30 and this Court's Scheduling Order, Defendants Gamal Abdelaziz, Elisabeth Kimmel, Marci Palatella, and John Wilson ("Defendants") respectfully request that the Court give the jury instructions attached as Exhibit A. Defendants reserve the right to submit supplemental requested jury instructions individually. Further, Defendants reserve the right to supplement, modify, or withdraw these requested instructions in light of the requests filed by the Government, the Court's rulings on the motions *in limine*, and the evidence ultimately admitted at trial.

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Respectfully submitted,

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DATED: August 2, 2021

CERTIFICATE OF SERVICE

I, Michael Kendall, hereby certify that on August 2, 2021, this document, filed through the CM/ECF system, will be sent electronically to all registered participants in this matter as identified on the Notice of Electronic Filing (NEF).

/s/ Michael Kendall